

November 20, 2008

Mr. Robert J. Whiting  
St. Paul District  
Corps of Engineers  
190 Fifth Street East, Suite 401  
St. Paul, MN 55101-1638

Subject: Zoo Interchange  
2007-6778-RMG  
WisDOT Project I.D. 1060-33-01

Dear Mr. Whiting,

I received your October 27 letter regarding your review of the draft Range of Alternatives Considered for the Zoo Interchange project. I will respond to each of the 11 points in your letter.

1. Please accept my apologies for failing to make this change after you brought it to our attention in your May 19, 2008 letter. The Corps contact information has been updated in the Zoo Interchange Coordination plan.
2. Thank you for being a cooperating agency.
3. After reviewing comments from all the participating agencies, including the Corps of Engineer's comments, WisDOT and FHWA concurred that the Purpose and Need statement did not need to be revised. The comments received (which were forwarded to you along with the revised Agency Coordination and Impact Assessment Methodology document) were limited and minor in scope.
4. Converting US 41/45 to an interstate is not the purpose of the Zoo Interchange study. The two studies are completely different in their scope, limits, and purpose. Regardless of whether US 41/45 is converted to an interstate there are safety, congestion and pavement/bridge condition issues on the Zoo Interchange that need to be addressed. WisDOT and FHWA have decided not to add US 41/45 interstate conversion as a purpose of the Zoo interchange reconstruction.
5. You are correct, this document is pre-decisional. However, in the context of the comment it appears that you meant the synopsis is pre-determined, rather than "pre-decisional." Let me assure you that no decision has been made regarding a preferred alternative. That will occur in 2009. WisDOT and FHWA have developed what the agencies believe is an adequate range of alternatives. The purpose of sending you this document was to seek the Corps of Engineer's input on the range of alternatives considered. If the Corps has an alternative that you believe should be added to the alternatives considered, please identify it.

6. This typographical error has been corrected.

7. Future traffic volumes are sensitive to the effects of rising gas prices. The future traffic volumes assume that in 2035 the price of gas is \$5.60 per gallon and the average fuel efficiency of vehicles is 30 miles per gallon.

8. The forecast of future traffic volumes assumes a wide range of travel demand management (TDM) and transportation system management (TSM) measures will be implemented. The regional planning process led by SEWRPC developed and ultimately approved a regional transportation plan referred to as the "TSM plus Highway Plan." Under this plan a wide range of TSM and selected roadway improvements would be implemented over the next 30 years. The plan includes improvement and expansion of public transit, bicycle and pedestrian facilities, TDM, and TSM. So the modernization alternatives for the Zoo Interchange essentially are the "hybrid" alternative that you suggest. We will clarify this point in the Draft EIS.

9. As noted in Section 2.1.3 WisDOT and FHWA have implemented many TSM alternatives on the southeast Wisconsin freeway system; others may be implemented with the modernization alternatives. The modernization alternatives are already a combination of TSM and freeway modernization. We will clarify this point in the Draft EIS.

10. Future traffic volumes are sensitive to the effects of rising gas prices. The future traffic volumes assume that in 2035 the price of gas is \$5.60 per gallon and the average fuel efficiency of vehicles is 30 miles per gallon.

11. Both the 6-lane and 8-lane version of the M2 alternative have been eliminated from consideration except on the south leg.

Thank you for your comments on the Zoo Interchange corridor study Range of Alternatives. Please feel free to contact me if you have any further comments or questions.

Sincerely,



Carrie Cooper  
Environmental Planner  
Wisconsin Department of Transportation

Cc: Rebecca Gruber/Corps of Engineers  
Sherry Kamke/U.S. EPA  
Stephanie Hickman/FHWA  
David Kopacz/FHWA  
Mike Thompson/DNR  
Jay Waldschmidt/WisDOT BEES

From: Gruber, Rebecca M MVP [mailto:Rebecca.M.Gruber@usace.army.mil]  
Sent: Tuesday, November 25, 2008 5:10 PM  
To: Cooper, Carrie - DOT  
Subject: Zoo Interchange

Carrie:

I have reviewed your agency letter crafted in response to our October 27, 2008 letter.

I appreciate your clarification. Yes, we did mean "pre-determined" (point 5). I apologize for this grave misrepresentation of our agency opinion.

We sincerely appreciate the information you have provided, and it does serve to adequately address our concerns identified to date (through the Range of Alternatives).

Please let me know should you require any additional information at this time.

Thank you for your close consideration of our agency concerns. We look forward to additional cooperation regarding this proposal.

Have a happy Thanksgiving.

Rebecca Gruber  
USACE Biologist  
1617 E. Racine Avenue  
Waukesha, Wisconsin 53186

(262) 547-4171, ext. 3

(262) 547-7869 (fax)

Please take a moment to complete our customer survey at:  
<http://per2.nwp.usace.army.mil/survey.html>





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUN 04 2008

REPLY TO THE ATTENTION OF:

E-19J

Mr. David Scott  
Federal Highway Administration  
525 Junction Road  
Suite 8000  
Madison, Wisconsin 53717

Ms. Carrie Cooper  
Wisconsin Department of Transportation  
141 N.W. Barstow  
Waukesha, Wisconsin 53187

Re: Concurrence on Agency Coordination Plan, Impact Analysis Methodology Document, and Purpose and Need Document for the Zoo Interchange Project in Milwaukee County in Wisconsin

Dear Mr. Scott and Ms. Cooper:

The U.S. Environmental Protection Agency (U.S. EPA) has received the May 1, 2008 correspondence from Wisconsin Department of Transportation (WisDOT) and Federal Highway Administration (FHWA) requesting comments on the Coordination Plan, Impact Assessment Methodologies, and Purpose and Need Documents for the Zoo Interchange Project. The Zoo Interchange is located at I-94 and I-894/US 45. The proposed project will evaluate reconstruction and redesign of this interchange and other adjacent interchanges, as well as mainline changes in this area of Milwaukee County in Wisconsin.

We have reviewed the Agency Coordination Plan, Impact Analysis Methodology Document, and the Purpose and Need Documents. We concur with the SAFETEA-LU 6002 Coordination Plan and Zoo Interchange Draft Purpose and Need Statement without any comments. We concur with the Impact Assessment Methodology document, April 2008 with the following comments regarding Wetlands Impact Methodology:

- 1) We recommend that FHWA and WisDOT characterize thoroughly the extent of impact to wetland resources in advance of the Draft Environmental Impact Statement. We are particularly concerned about impacts to Advanced Identification (ADID) wetlands and other aquatic resources. Early coordination on this resource is recommended to help identify and resolve matters relating to this resource.

- 2) We recommend that FHWA and WisDOT consider undertaking a merged NEPA/404 process for handling wetland resource impact concerns, especially if the number of impacted wetland acres is large or if a significant portion of wetland resources is ADID.
- 3) New regulations on compensatory mitigation for wetlands were issued by EPA and the U.S. Army Corps of Engineers (the Corps) on May 31, 2008. These regulations are designed to improve the effectiveness of compensatory mitigation to replace lost aquatic resource functions and areas, expand public participation in compensatory mitigation decision making, and increase the efficiency and predictability of the mitigation project review process. Given our interest in protecting ADID wetlands and other aquatic resources in the Zoo Interchange project area, we believe this new rule and its implications should be carefully considered. Links to the final rule and supporting materials can be found at: <http://www.epa.gov/wetlandsmitigation/>.

Thank you for providing us this opportunity to provide comments on this project. If you have any questions, please call Sherry Kamke of my staff at 312-353-5794.

Sincerely,



Kenneth A. Westlake, Supervisor  
NEPA Implementation  
Office of Enforcement & Compliance Assurance



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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OCT 28 2008

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Mr. David Scott  
Federal Highway Administration  
525 Junction Road  
Suite 8000  
Madison, Wisconsin 53717

Ms. Carrie Cooper  
Wisconsin Department of Transportation  
141 N.W. Barstow  
Waukesha, Wisconsin 53187

Re: Concurrence on Section 2 Alternatives Document for the Zoo Interchange Project in  
Milwaukee County in Wisconsin

Dear Mr. Scott and Ms. Cooper:

The U.S. Environmental Protection Agency (U.S. EPA) has received the September 23, 2008 correspondence from Wisconsin Department of Transportation (WisDOT) and the Federal Highway Administration (FHWA) requesting comments on the Alternatives document for this project. Our Agency provided our concurrence on the purpose and need for this project on June 4, 2008 when we expressed concerns about wetlands. The proposed project will evaluate reconstruction and redesign of this interchange and other adjacent interchanges, as well as highway mainline changes in this area of Milwaukee County in Wisconsin.

The Alternatives section presents a broad range of initial alternatives for consideration, and an screening of those alternatives to a small set of alternatives that will be retained for detail study. The process used is appropriate, and we agree with the conclusion made to retain three alternatives for detailed study: (1) No-Build Alternative, (2) Modernization with No Added Capacity (6-lane) Alternative, and (3) Modernization with Added Capacity (8-lane) Alternative.

From the existing information that we have reviewed so far, it appears that the amount of natural resources that may be impacted from the project are not as significant as the potential for business and residential relocations. We would appreciate receiving copies of impact summary information for the alternatives as they are developed.